

MEMORANDUM

SUBJECT: (1) Issues related to quality assurance data in AMP255 reports
(2) Update on transmittal of ZIP files to EPA in support of data certification activities

FROM: Lewis Weinstock, Acting Group Leader, Ambient Air Monitoring Group
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We have been receiving calls and emails from monitoring organization that are starting the review of data in support of CY2007 certifications that are due on July 1, 2008. These contacts have indicated that the QA requirements, as reported by the required AMP255 report, are not correct. This memo identifies where there are inconsistencies in the AMP255 with the current CFR requirements. Table 1 provides a summary of these inconsistencies that will need to be fixed in the report.

The AMP255 was developed prior to the Oct 17, 2006 monitoring regulation changes and therefore reflect some of the pre-2006 QA requirements. In many cases the 2006 requirements reduced the frequency of a number of our QA requirements, particularly our PM10 and PM2.5 requirements for flow rate audits and collocation. Since the reduced requirements have not been included in the AMP255 evaluations, the completeness reports will, in most cases (with the exception of lead flow rate audits which was increased from 1 to 2 per year), be reporting lower completeness than it should. For example, using the first item in Table 1, the PM10 automated flow rate verification was revised in 2006 from every two weeks to once a month (50% reduction). So, an agency that performed all their monthly flow rate verification would see a misleading 50% completeness estimate in the AMP255 instead of 100%.

The Ambient Air Monitoring Group is aware of these inconsistencies identified in Table 1 and will take them into account when performing the data certification reviews. The National Air Data Group is also aware of the problems and they are planning to correct the AMP255 later this year. It is anticipated that the issues identified in Table 1 will be corrected before the beginning of 2009 if not sooner.

Additionally, please note that the instructions for data certification (see question 11) that were distributed by OAQPS earlier in May noted that the ZIP file produced by the AMP255 report was to be attached to emails requesting review of data certifications that were transmitted by monitoring agencies to EPA. Please note that EPA's firewall automatically removes attached ZIP files, so such files must be renamed (e.g, from .ZIP to .PIZ) before emailing to the Regions and/or David Lutz at OAQPS.

Table 1- AMP255 inconsistencies with Oct 17, 2006 monitoring QA regulations

Parameter	Indicator	Issue	What the AMP255 assumes is required	What Appendix A Requires	Effect
Automated PM10	Completeness	Required # Flow Rate Verifications	Every 2 Weeks	Once Per month	Completeness will falsely appear low
Manual PM10 and PM2.5	Precision Value	Minimum Sample Value for Collocated Samples to be used in CV calculation	PM10 = 20; PM2.5 = 6	PM10 = 15; PM2.5 = 3	Less values will go into CV estimate
PM10 and PM2.5	Completeness	Semi-Annual Flow Rate Audit	Once per Quarter	Once every 6 months	Completeness will falsely appear low
Manual PM10, PM2.5, and Lead	Completeness	Collocation Sampling frequency	1 every 6 days	1 every 12 days	Completeness will falsely appear low
Manual PM10 and Lead	Completeness	Number of collocated sites for the PQAO	Based on a pre-2006 table with the number of sites in the PQAO	15% of the sites in the PQAO	May not have much effect
Lead	Completeness	Required # of Lead Flow Rate Audits	One per Year	One every 6 months	Completeness will falsely appear high
O3, CO, NO2, SO2	Completeness	Number of Audit Levels to show the upper and lower probability limits (all gases)	4 Levels	5 Levels	Possible loss of one statistic if level 5 used
O3, CO, NO2, SO2	NA	New Audit Levels need to be incorporated	Uses "old" values (pre-2006)	Use "new" values (2006)	No effect on data
All Pollutants	NA	Formatting issues with upper and lower probability limits	The value should display as "(-x, +y)", but the program is currently splitting the value across two columns because of the "," between "x" and "y".	n/a	No effect on data